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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARTIN D. ANDREW,

Plaintiff,

vs.

TRANSUNION, LLC; and AMERICAN
EXPRESS COMPANY,

Defendants.

Case No.: 2:19-cv-00331-JAD-PAL

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
AMERICAN EXPRESS NATIONAL
BANK TO FILE RESPONSE TO
PLAINTIFF'S COMPLAINT [ECF NO. #1]
[FIRST REQUEST]**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, MARTIN D. ANDREW, and Defendant, AMERICAN EXPRESS NATIONAL BANK (incorrectly designated in the Complaint as "American Express Company") (hereafter "AMEX"), by and through their undersigned counsel, that Defendant AMEX may have an additional 30 days within which to answer or otherwise respond to Plaintiff's complaint [ECF No. 1], which was served on Defendant on February 25, 2019.

Therefore, the parties agree that the last day for AMEX to answer or otherwise respond to Plaintiff's complaint is Wednesday, April 17, 2019.

This request is made in good faith and not for the purpose of undue delay. This document is being electronically filed through the Court's CM/ECF System. Accordingly, counsel for Defendants hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document and

has authorized defense counsel to affix his electronic signature hereto; and (3) a record supporting this concurrence could be made available if so ordered by this Court.

Dated this 15th day of March, 2019.

Respectfully submitted,

REID RUBINSTEIN & BOGATZ

HAINES & KRIEGER, LLC


By: /s/ Kerry E. Kleiman, Esq.
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By: /s/ Shawn W. Miller, Esq.
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ORDER

IT IS SO ORDERED.

DATED this 20th day of March, 2019.


UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE